

Fill in this information to identify the case:

Debtor 1	<u>Robert Werner Wege</u>
Debtor 2 (Spouse, if filing)	<u>Nancy Elizabeth Wege</u>
United States Bankruptcy Court for the: <u>Middle</u>	District of <u>Pennsylvania</u>
Case number	<u>1:20-bk-00513-HWV</u>

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of Creditor: Metropolitan Life Insurance Company Court claim no. (if known): 10

Last 4 digits of any number you use to identify the debtor's account: XXXXXX2201

Property address: 5191 Glen Echo Rd  
Number      Street

Glen Rock, PA 17327  
City      State      ZIP Code

#### Part 2: Pre-petition Default Payments

Check one:

- Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim
- Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

#### Part 3: Post-petition Mortgage Payment

Check one:

- Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5)  
 of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: 06/01/2025  
MM/DD/YYYY

**Post-petition payment amount is \$1,644.25.**

- Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total post-petition payments due: \_\_\_\_\_  
b. Total fees, charges, expenses, escrow, and costs outstanding: \_\_\_\_\_  
c. **Total.** Add lines a and b: \_\_\_\_\_

(a) \$ \_\_\_\_\_ 0.00  
(b) \$ \_\_\_\_\_ 0.00  
(c) \$ \_\_\_\_\_ 0.00

Creditor asserts that the debtor(s) are contractually  
Obligated for the post-petition payment(s) that first became  
Due on: \_\_\_\_\_ MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box:*

- I am the creditor  
 I am the creditor's authorized agent

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Reka Beane  
Signature

Date 04/14/2025

Print

Reka Beane  
First Name   Middle Name   Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 325 Chestnut Street, Suite 725  
Number  Street

Philadelphia, PA 19106  
City  State  Zip Code

Contact phone 954-332-9370 Email Reka.Beane@mccalla.com

In Re: Robert Werner Wege  
Nancy Elizabeth Wege

Bankruptcy Case No.: 1:20-bk-00513-HWV  
Chapter: 13  
Chief Judge: Henry W. Van Eck

CERTIFICATE OF SERVICE

I, Reka Beane, of McCalla Raymer Leibert Pierce, LLP, 325 Chestnut Street, Suite 725, Philadelphia, PA 19106, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Robert Werner Wege  
5191 Glen Echo Road  
Glen Rock, PA 17327

Nancy Elizabeth Wege  
5191 Glen Echo Road  
Glen Rock, PA 17327

Thomas E. Miller, Esq.  
Becker Law Group, P.C.  
529 Carlisle Street  
Hanover, PA 17331

*(served via ECF Notification)*

Jack N Zaharopoulos, Trustee  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

*(served via ECF Notification)*

United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

*(served via ECF Notification)*

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 04/14/2025 By: /s/Reka Beane  
(date) Reka Beane,  
Authorized Agent for the Creditor